

Holland & Knight

31 West 52nd Street | New York, NY 10019 | T 212.513.3200 | F 212.385.9010
Holland & Knight LLP | www.hklaw.com

Loren L. Forrest Jr.
+1 917-854-9800
Loren.Forrest@hklaw.com

June 21, 2022

VIA ECF

Judge Pamela K. Chen
Courtroom: 4F
Chambers: N 631
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Briefing Schedule for Revised Motion to Compel Arbitration*
Carlos Collazos v. Garda CL Atlantic, Inc.; 21-cv-02095-PKC-JRC

Dear Judge Chen:

The undersigned represents Defendant Garda CL Atlantic, Inc. (“Garda”) in its Revised Motion to Compel Arbitration of Individual Claims and Stay Litigation of Class Action Claims. Defendant proposes, and Plaintiff has consented to, a change to the briefing schedule for the motion to compel arbitration.

Originally, the parties jointly requested, and the court granted, the following briefing schedule: (1) Defendant’s revised motion to compel is due on or before May 18, 2022; (2) Plaintiff’s opposition is due on or before June 1, 2022; and (3) Defendant’s reply, if any, is due on or before July 10, 2022.

On June 1, 2022, Plaintiff requested, with Defendant’s consent, and the court granted an extension of, the briefing schedule as follows: (2) Plaintiff’s opposition is due on or before June 22, 2022; and (3) Defendant’s reply, if any, is due on or before July 13, 2022.

Defendant now proposes, and Plaintiff has consented to, the following schedule: (1) Defendant’s revised motion to compel is due on or before June 24, 2022; (2) Plaintiff’s opposition is due on or before July 1, 2022; and (3) Defendant’s reply if any, is due on or before July 13, 2022.

Defendant proposes the adjustment to the briefing schedule, in light of *Southwest Airlines Co. v. Saxon*, No. 21-309, 2022 WL 1914099 (U.S. June 6, 2022), which was decided by the U.S. Supreme Court on June 6, 2022, and which concerns the scope of the Federal Arbitration Act’s

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§1 exemption for “workers engaged in foreign or interstate commerce.” Defendant plans only minor revisions to its original submission and does not otherwise adjust the date of the last submission in the briefing schedule.

Respectfully submitted,

HOLLAND & KNIGHT LLP

A handwritten signature in black ink, appearing to read "Loren L. Forrest Jr.", with a stylized flourish at the end.

Loren L. Forrest Jr.

cc: All counsel of record via ECF